

**EPA Comments on
CALFED's Role and Policy With Respect to San Joaquin River Water Quality Problems
March 19, 1997**

3/10/97
EPA has reviewed the 3/10/97 draft of the strategy paper addressing San Joaquin River water quality issues. In general, this paper seems to be an awkward way to address the scoping issue as to whether the water quality program will address issues in the Tulare Lake basin. We endorse the recommendation that CALFED limit its scope to the San Joaquin basin. Yet, this paper does not clearly convey that intent. It does, however, raise a number of issues (perhaps unintentionally) with regard to addressing water quality problems in the San Joaquin basin. Below are our comments regarding some of these issues.

SJR 3/10
The reference to "collection and disposal to ocean" (page 2, first paragraph, third sentence) as a mechanism to "to permanently reduce the salt load coming into the river from agricultural activities" should be deleted. The emphasis should be on in-valley solutions that will indeed reduce the salt loads and not on transferring these wastes to another location. The inclusion of out-of-valley disposal as an option is contrary not only to the recommendations of the San Joaquin Valley Drainage Program's Management Plan (the Rainbow report), but also to the CALFED solution principle that "solutions will not solve problems...by redirecting significant negative impacts...within the Bay-Delta or to other regions of California."

SJR 3/10
As discussed at the PCT meeting, CALFED's program should strive for fully addressing water quality problems and not limit its potential actions or scope only to those that are consistent with the San Joaquin Valley Drainage Implementation Program (SJVDIP). Thus, the statements that "the SJVDIP will provide the overall direction for long term solutions of these problems" for CALFED (page 2, paragraph 1, last sentence) should be changed to reflect that CALFED will work with the SJVDIP and other entities to address these problems.

Similarly, the criteria stating "consistency with the San Joaquin Valley Drainage Improvement (sic) Program and other existing water quality management and control programs" (page 2, bullet # 3) should be revised to reflect that CALFED will build upon existing efforts but not necessarily limit its activities based upon these efforts. CALFED should be defining a program that addresses the problems, not just endorsing the status quo.

3/10
The language in the last paragraph on page 2 ("CALFED will participate with San Joaquin Valley stakeholders, especially the staff of the SJVDIP in formulating detailed plans, policies and actions" should be revised to embrace a leadership role for CALFED (i.e. "CALFED will involve stakeholders..."). Also, it seems inappropriate to single out only one program - either other stakeholders or programs should be listed or the reference to SJVDIP should be deleted.

3/10
On page 1, the bullets list the sources of a variety of water quality problems; on page 2, it states that "CALFED shall adopt a whole watershed approach" in resolving problems from these sources (second paragraph, first sentence). However, as also discussed at the PCT meeting, most of the rest of the text focuses solely on agricultural drainage issues and not on the other significant water quality problems listed.

3/10
A couple of minor word additions: Revise the fourth sentence, first paragraph, page 1 to read "parameters of concern to the Delta, and its inhabitant species, and water users. Add selenium to the list of constituents of concern coming from surface runoff (page 1, last bullet). Delete reference to Table 1 at end of first paragraph.